

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

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<p>JORGE LUIS RAMOS ORTIZ and FRANCISCO MARTINEZ, Plaintiffs, vs. CARMEN PARAMO, MARTIN J. CATALANO FARMS LLC, and MARTIN CATALANO, Defendants.</p>	<p><u>Document Electronically Filed</u> DOCKET NO. 06-cv-3062 (RBK-AMD) CIVIL ACTION NOTICE OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND EXPENSES Oral Argument Requested RETURN DATE: January 19, 2010</p>
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**To: John G. DeSimone, Esq.
Attorney for Defendants Martin J. Catalano Farm, LLC and
Martin Catalano**

**Michael M. Mulligan, Esq.
Attorney for Defendant Carmen Paramo**

PLEASE TAKE NOTICE THAT the undersigned attorneys for the Plaintiffs will make application to the Honorable Robert B. Kugler, United States Judge, on Tuesday, **January 19, 2010**, or as soon after as can be heard, for an award of attorneys' fees and expenses against all defendants in

this case pursuant to the Court's Opinion [ECF # 65] and Judgment [ECF # 66] in this case (both dated December 1, 2009), the Fair Labor Standards Act 29 U.S.C. § 216(b) and the New Jersey Minimum Wage Standards Act N.J.S.A. § 34:11-56a25, and Fed. R. Civ. P. 54 and Loc. Civ. R. 54.2.

Pursuant to Fed. R. Civ. P. 54, it is estimated that the amount sought will be approximately \$77,650.00.

IN SUPPORT OF this motion, the Plaintiffs will rely upon the following:

- (a) A detailed affidavit that will be filed with the court within 30 days of the entry of the judgment, pursuant to Loc. Civ. R. 54.2, and
- (b) A Brief that will be filed with the court by December 24, 2009 (which is the initial filing deadline for motions made returnable for January 19, 2010).

Pursuant to Loc. Civ. R. 54.1, a separate application for taxable costs will be filed with the court within 30 days of the entry of the judgment.

Oral argument is requested.

Date: December 15, 2009

Respectfully Submitted: /s/ Lazlo J. G. Beh, Esq. (LB0921)